



Oregon

Theodore Kulongoski, Governor

Department of Environmental Quality

Northwest Region Portland Office

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July 10, 2009

Jim Stahly
General Manager
Linnton Plywood Association
10504 NW St. Helens Road
Portland, OR 97231

RE: No Further Action Determination
Linnton Plywood Association
Tax Lots 100, 200, and 800
ECSI Site ID Nos. 2373 and 2351

Dear Mr. Stahly:

The Oregon Department of Environmental Quality (DEQ) has completed a review of the document entitled *Linnton Plywood Association Environmental Assessment*, dated August 2007 and submitted to DEQ on your behalf by CH2M Hill. The property consists of tax lots number 100 and 200 in the southwest quarter and tax lot 800 in the northwest quarter of section 2, township 1 north, range 1 west, Willamette Meridian (see attached site plans). The work described in the report was based on the Scope of Work of the voluntary agreement dated June 5, 2000 and as described in your letter of January 25, 2007.

DEQ has determined that no further action is required to address environmental contamination at the Linnton Plywood Association property which encompasses two sites identified in the Environmental Cleanup Site Information (ECSI) database: the original Linnton Plywood Association site, ECSI number 2373, and the Glacier Northwest Inc. site, ECSI number 2351, which is a sub-leased portion of the Linnton Plywood Association site. This determination is based on the regulations and facts as we now understand them, including but not limited to the following:

1. This facility operated as a sawmill from 1894 through 1947, and as a plywood mill from 1951 through 2001. The southern portion of the property has had a leased sand distribution facility in operation since 1997, and several smaller businesses have leased portions of the mill site since the plywood operation ceased. Very limited contamination was found associated with the mill operations and maintenance activities.
2. Site investigations identified contamination above conservative screening levels in a knife grinding grit pile and in soils at Outfall 5. Soils were removed in both of these areas, as described below. Limited exceedances of conservative screening values for human or ecological receptors remain at the site, located at depth or where current site conditions do not provide complete exposure routes.

3. Groundwater investigations have identified a petroleum hydrocarbon plume in the southeast corner of the property that originates at the neighboring ARCO Bulk Terminal 22T (ECSI number 1528) and that is being actively addressed by BP West Coast Products, LLC. Levels of contaminants in groundwater in other site areas do not exceed relevant risk-based levels or levels that impact the identified beneficial uses of the site groundwater. There are no groundwater wells near the facility. The current zoning and reasonably likely future uses for the property are industrial.
4. Based on site investigations and the two limited removals, DEQ issued a Source Control Decision for the site on May 7, 2004 that determined that the upland portion of the site was not a current source of contamination to the Portland Harbor, and that no additional source control actions were required. Recent additional investigations and reviews have supported that earlier determination. However, this no further action determination (NFA) is limited to upland concerns and all decisions concerning the Willamette River and river sediments are under the authority of the U.S. Environmental Protection Agency Superfund Program.
5. Human health risks were evaluated for soil and groundwater for all exposure pathways, with occupational and excavation/construction workers as the most common receptors. The risk assessment did not identify any unacceptable risks under current site conditions. One sample of an ash-like material from two feet in depth at the location originally designated as Ash Placement West contained lead slightly above the screening level. It appears to be associated with buried debris from the former saw mill. This is not a current risk because the material is buried beneath pavement and not available for human contact. To avoid potential future risk, this area should either remain undisturbed or be further assessed and appropriately handled during redevelopment.
6. The ecological risk evaluation did not identify areas of ecological concern for terrestrial receptors.
7. In May and July of 2003 two limited soil removal actions were completed at the site. Approximately 34 cubic yards of abrasive debris and soil were removed from the knife grinding area and 9.4 cubic yards of soil were removed from the Outfall 5 discharge area. Confirmatory sampling showed the removal actions were effective in eliminating unacceptable human and ecological risks in both locations.
8. DEQ provided notice to the public of DEQ's intent to issue a no further action determination with a period for public comment of May 1 through June 1, 2009. A public meeting was also held on May 20, 2009. No comments were received.

Based on screening level detections, some limited contamination may remain on the Linnton Plywood Association site. DEQ approves leaving any such limited contamination in place because it does not present an unacceptable risk to human health, safety, welfare and the environment under the conditions described above.

DEQ concludes that based on the information presented to date, the Linnton Plywood Association site is currently protective of public health and the environment and requires no further action under the Oregon Environmental Cleanup Law, ORS 465.200 et seq., unless new or previously undisclosed information becomes available to change this conclusion. This decision does not apply to the known groundwater contamination in the southeast corner of the property that is the responsibility of BP West Coast Products, LLC in response to a release from their property.

We will update the Environmental Cleanup Site Information System (ECSI) database to reflect this decision by DEQ. Any redevelopment at the site is to be conducted in accordance with applicable DEQ regulations and policies.

The Linnton Plywood Association property was screened as required by ORS 465.225 but was not recommended for placement on DEQ's Inventory of sites that have a confirmed release or need additional investigation. The Environmental Cleanup Site Information System (ECSI) database reflects this decision.

DEQ recommends keeping a copy of all of the documentation associated with this remedial action with the permanent facility records.

If you have any questions about this letter, please contact Loren Garner at 503-229-6900 or via email at garner.loren@deq.state.or.us.

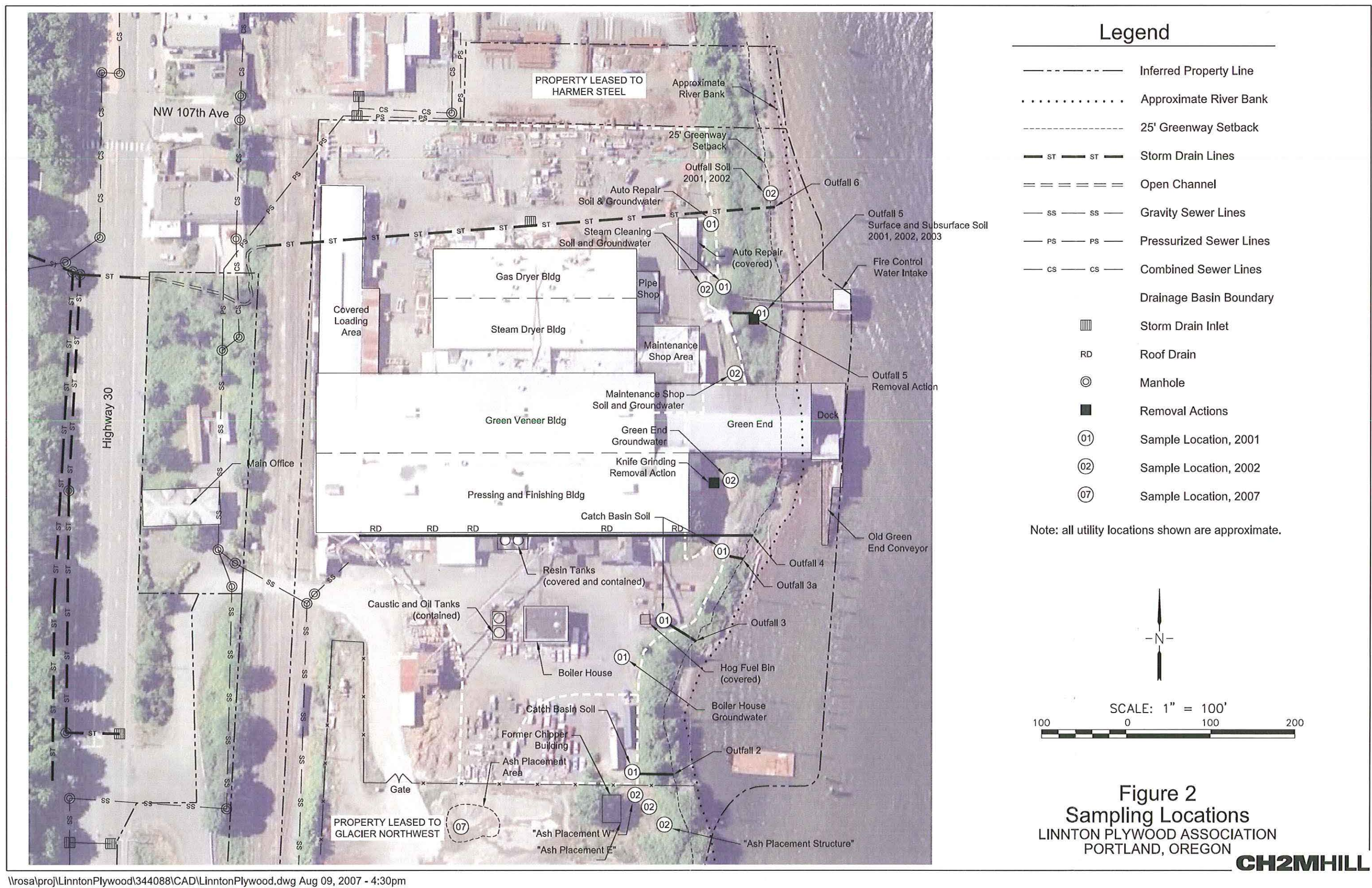
Sincerely,



Keith Johnson
Environmental Cleanup Program
Northwest Region

Enclosure: Site plans

cc: Bill Hutchison, Foster Pepper, LLP
Paul Burnet, CH2M Hill
Kristine Koch, USEPA, Office of Environmental Cleanup
ECSI file Nos. 2373 and 2351



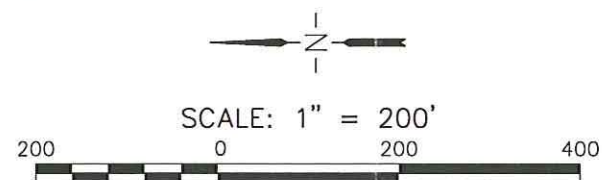
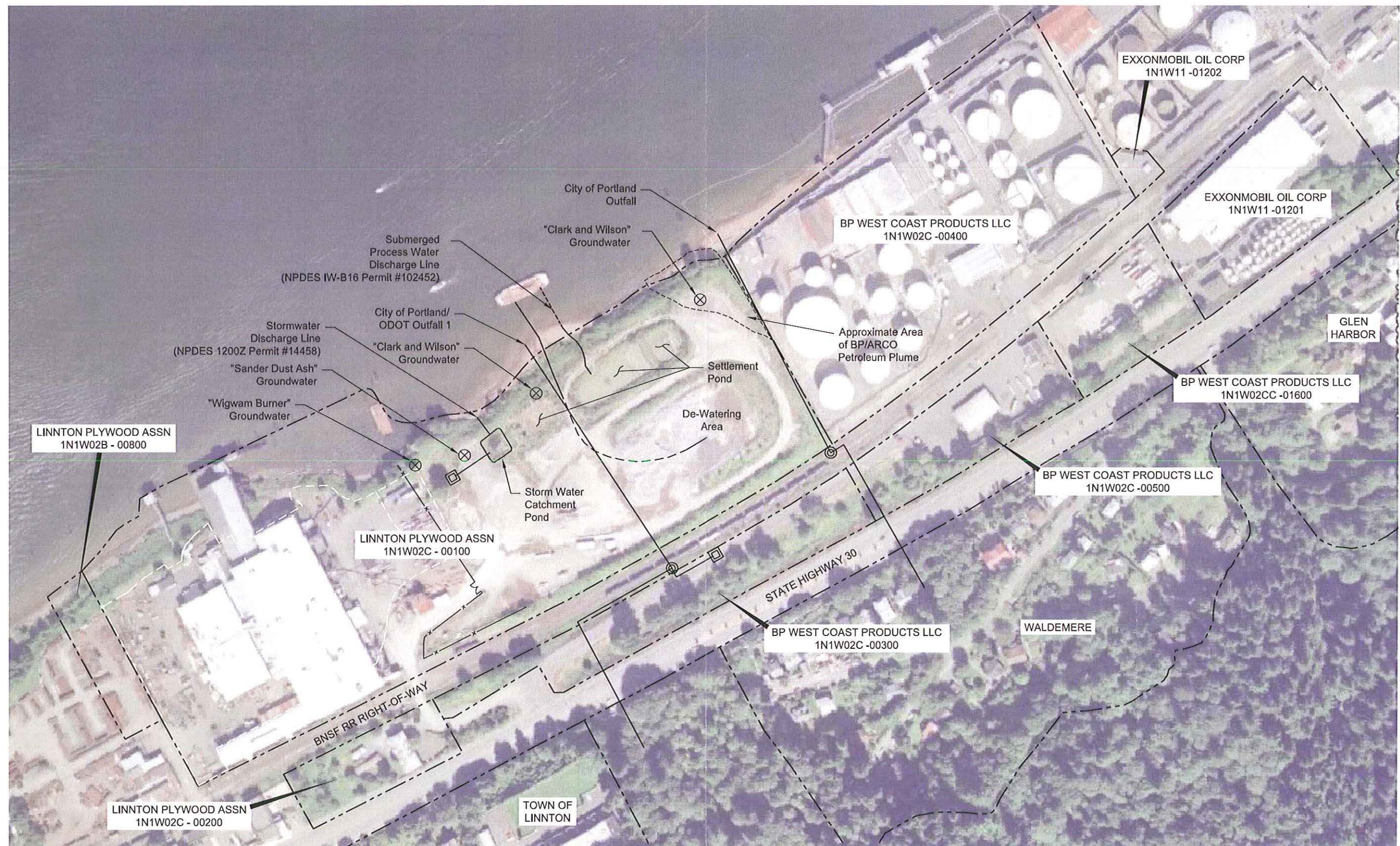


Figure 3
 Linnton Surrounding Parcels
 LINNTON PLYWOOD ASSOCIATION
 PORTLAND, OREGON

CH2MHILL